

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
BRUNSWICK DIVISION

UNITED STATES OF AMERICA        )  
                                      )      CASE NO: 2:21-CR-13  
                                      )  
                                      )  
v.                                 )  
                                      )  
                                      )  
YORDON VELAZQUEZ VICTORIA    )  
                                      )  
                                      )

**GOVERNMENT'S MOTION FOR RECIPROCAL DISCOVERY**

The United States of America files this motion to require Defendant to produce and disclose the following documents and evidence related to the above-captioned case. Said motion is being filed by the Government pursuant to Fed. R. Crim. P. 16(b)(1), as the government is complaining with and disclosing information under Fed. R. Crim. P. 16(a)(1)(E), (F) and (G).

1.     **Documents and Objects.** Books, papers, documents, photographs, tangible objects, or copies or portions thereof, which are within the possession, custody or control of Defendant and which Defendant intends to introduce as evidence in his case-in-chief at trial. See Fed. R. Crim. P. 16(b)(1)(A).

2.     **Reports of Examinations and Tests.** Results or reports of physical or mental examinations and of scientific tests or experiments made in connection with this particular case, or copies thereof within the possession or control of Defendant which Defendant intends to introduce as evidence-in-chief at the trial or which were prepared by a witness whom Defendant intends to call at trial when the results or reports relate to their testimony. See Fed. R. Crim. P. 16(b)(1)(B).

3. **Expert Witnesses.** A written summary of any evidence Defendant intends to offer under Rules 702, 703 or 705 of the Federal Rules of Evidence as evidence at trial, describing the expert witness's opinions, the bases and reasons for those opinions, and the witness's qualifications. See Fed. R. Crim. P. 16(b)(1)(C).

WHEREFORE, the Government respectfully respects that Defendant be required to produce all documents and evidence referred to above.

Respectfully submitted,

DAVID H. ESTES  
ACTING UNITED STATES ATTORNEY

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